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15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**  
17 **WESTERN DIVISION**

18 ANITA WHITE, an Individual, on Her  
Own Behalf and on Behalf of All Others  
19 Similarly Situated,

20 Plaintiff,

21 vs.

22 EDEBITPAY, LLC, et al.,

23 Defendants.  
24  
25  
26  
27  
28

Case No.: CV11-06738 CBM (FFMx)  
Honorable Consuelo B. Marshall

**CLASS ACTION**

**JOINT STIPULATION RE:  
CONTINUING FILING DATE  
FOR MOTION FOR CLASS  
CERTIFICATION**

Current Filing  
Deadline: Jan. 23, 2012

Proposed New  
Filing Deadline: TBD at the  
Feb. 13, 2012  
Scheduling  
Conference

1 This Stipulation is made and entered into by plaintiff Anita White  
2 (“Plaintiff”) and defendants EDebitPay, LLC; Platinum Online Group, LLC; Dale  
3 Paul Cleveland; and William Richard Wilson (“Defendants”) (collectively, the  
4 “Parties”), by and through their counsel of record, based on the following recitals:

5 1. The original Complaint in this action was filed on August 16, 2011.  
6 Subsequent to the filing of the above-captioned case, Plaintiff learned of a related  
7 action against Defendants that is pending in the United States District Court for  
8 the Northern District of California, captioned *Deffenbaugh, et al. v. EDebitPay,*  
9 *L.L.C., et al.*, CV-11-3024 (EMC) (the “*Deffenbaugh* Action”). See Notice of  
10 Pendency of Other Action [Docket #18].

11 2. The court in the *Deffenbaugh* Action ordered the parties in that case  
12 to conduct a mediation, which has been scheduled and confirmed for January 24,  
13 2012. In an effort to globally resolve all claims asserted against Defendants, the  
14 Parties in the above-captioned action and in the *Deffenbaugh* Action have agreed  
15 to jointly mediate both cases on January 24, 2012.

16 3. The current date for Plaintiff to file her Motion for Class Certification  
17 is January 23, 2012 [*see* Docket #10]. The Parties agree that continuing this  
18 deadline to a date after the January 24, 2012 mediation would be prudent, as the  
19 motion would be unnecessary if the case is resolved, thereby conserving  
20 substantial judicial and litigant resources.

21 BASED THEREON, IT IS HEREBY STIPULATED AND AGREED AS  
22 FOLLOWS:

23 The date by which Plaintiff must file a Motion for Class Certification is  
24 continued from January 23, 2012 to a date that will be set at the February 13, 2012  
25 Scheduling Conference.

26 IT IS SO STIPULATED.

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1 Dated: January 10, 2012

ARIAS OZZELLO & GIGNAC LLP

2 By: /s/ Denis M. Delja

3 MIKE ARIAS

4 DENIS M. DELJA

5 *Attorneys for Plaintiff*

6 Dated: January 10, 2012

LOEB & LOEB LLP

7 By: /s/ Christine M. Reilly

8 MICHAEL L. MALLOW

9 CHRISTINE M. REILLY

10 *Attorneys for Defendants*